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**UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION**

AMERICAN FEDERATION OF
GOVERNMENT EMPLOYEES, *et al.*

Plaintiffs,

v.

DONALD J. TRUMP, *et al.*,

Defendants.

Case No. 3:25-cv-03698-SI

DECLARATION OF STEPHEN M. BILLY

1 I, Stephen M. Billy, declare, pursuant to 28 U.S.C. § 1746, as follows:

2 1. I currently serve as a Senior Advisor for the Office of Management and Budget
3 (OMB), Executive Office of the President. I have occupied this position since January 24, 2025.

4 2. I provide this Declaration pursuant to the directive on pages 40-41 of this Court's
5 May 9 order stating that "defendants shall serve and file a declaration(s) verifying that they have
6 complied with this Order, including serving a copy of this order on every defendant agency head,
7 and detailing what additional steps, if any, they have taken to comply."

8 3. Since the Court issued its Order just before 9:30 pm Eastern Time on Friday,
9 Defendants have worked diligently to comply with the Order. Initially, less than thirty minutes
10 after the Order issued, counsel for the government informed OPM, OMB, USDS, and the vast
11 majority of the enjoined components of the Order and attached a copy of the order.

12 4. On May 12, counsel for the Government emailed all enjoined components,
13 informed them of the Order's directive to serve a copy of Order on the component head, directed
14 them to provide a copy to their component head, and further directed them to email several
15 individuals (including myself) to verify that they had done so. All enjoined components have since
16 confirmed that they have complied with the Court's directive.

17 5. Also on May 12, counsel for the Government sent compliance instructions to all
18 enjoined components. The content of those instructions is privileged. But the instructions
19 emphasized, among other things, that although the Government has appealed the order, the
20 enjoined components must comply with it until there is relief from the Order from this Court or a
21 higher court. The instructions, in addition to providing a detailed summary of the Order and setting
22 forth compliance guidance, emphasized that Department of Justice attorneys are available to
23 answer questions and that enjoined components should consult with Department of Justice
24 attorneys before taking any actions arguably implicating the Order.

25 Pursuant to 28 U.S.C. § 1746, I declare under penalty of perjury that the foregoing is true
26 and correct based on my personal knowledge.

1 Dated: May 13, 2025

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4 /s/ Stephen M. Billy
5 Stephen M. Billy
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